

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE GREENEVILLE DIVISION

JANE DOE 1, JANE DOE 2, JANE DOE 3,)
JANE DOE 4, JANE DOE 5, K.T. and M.T.,)
Personal Representatives to JANE DOE 6,)
JANE DOE 7, JANE DOE 8, and)
JANE DOE 9,)

Plaintiffs,)

VERSUS)

No. 2:23-cv-00071-TRM-CRW

CITY OF JOHNSON CITY, TENNESSEE,)
KARL TURNER, individually and in his)
official capacity as Chief of the)
Johnson City Police Department,)
KEVIN PETERS, individually and in his)
official capacity as Captain in the)
Johnson City Police Department,)
TOMA SPARKS, individually and in his)
official capacity as Detective in the)
Johnson City Police Department, and)
DOES 5-10, inclusive,)

Defendants.)

PLAINTIFFS' RESPONSE AND OBJECTION TO FIRST SET OF
INTERROGATORIES TO JANE DOE 7
ON BEHALF OF DEFENDANT KEVEN [stet] PETERS

Plaintiffs hereby respond and object to Defendant Peters' First Set of Interrogatories
to Plaintiff Jane Doe 7, pursuant to Fed. R. Civ. P. 33.

RESPONSE TO INTERROGATOR[Y]

1. Identify your actual name (not pseudonym) and address, and the actual
names (not pseudonyms), and addresses of the following: Jane Doe 1, Jane Doe 2, Jane

Doe 3, Jane Doe 4, Jane Doe 5, K.T. and M.T., Personal Representatives to Jane Doe 6, Jane Doe 6, Jane Doe 8, and Jane Doe 9.

RESPONSE: Response: Objection. As asserted in the proposed Second Amended Class Complaint, there will be only three representative plaintiffs, none of which are Jane Doe 7.

Dated: December 22, 2023

Respectfully submitted,

s/ Heather Moore Collins
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—and—

s/ Vanessa Baehr-Jones
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—and—

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CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been served via email on December 22, 2023 to counsel of record:

<p>K. Erickson Herrin HERRIN, McPEAK & ASSOCIATES 515 East Unaka Avenue P. O. Box 629 Johnson City, TN 37605-0629 Email: lisa@hbm-lawfirm.com</p> <p>Emily C. Taylor Reid Spaulding WATSON, ROACH, BATSON & LAUDERBACK, P.L.C. P.O. Box 131 Knoxville, TN 37901-0131 Email: etaylor@watsonroach.com Email: rspaulding@watsonroach.com</p> <p><i>Attorneys to Defendants, Johnson City, Tennessee, Karl Turner, in his individual and official capacities, Captain Kevin Peters, in his official capacity, and Investigator Toma Sparks, in his official capacity</i></p>	<p>Daniel H. Rader III Daniel H. Rader IV MOORE, RADER & YORK PC 46 N. Jefferson Avenue P.O. Box 3347 Cookeville, TN 38502-3347 danrader@moorerader.com danny@moorerader.com <i>Counsel for Kevin Peters in his individual capacity</i></p> <p>Kristin Ellis Berexa Ben C. Allen FARRAR BATES BEREXA 12 Cadillac Drive, Suite 480 Brentwood, TN 37027-5366 kberexa@fbb.law ballen@fbb.law <i>Counsel for Toma Sparks in his individual capacity</i></p> <p>Keith H. Grant Laura Rufolo Robinson, Smith & Wells, PLLC 633 Chestnut Street, Suite 700 Chattanooga, TN 37450 E-mail: kgrant@rswlaw.com E-mail: lrufolo@rswlaw.com</p> <p><i>Counsel for Justin Jenkins in his individual capacity</i></p>
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s/Heather Moore Collins

